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14 SAMSUNG SDI BRASIL LTDA.,  
SHENZHEN SAMSUNG SDI CO., LTD. and  
15 TIANJIN SAMSUNG SDI CO., LTD.

16 UNITED STATES DISTRICT COURT  
17  
18 NORTHERN DISTRICT OF CALIFORNIA  
19  
20 SAN FRANCISCO DIVISION

21 IN RE: CATHODE RAY TUBE (CRT)  
22 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

23 This Document Relates to:

24 *All Indirect Purchaser Actions*

25 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*  
26 *et al.*, No. 13-cv-1173;

27 *Sharp Elecs. Corp. v. Koninklijke Philips*  
28 *Elecs. N.V.*, No. 13-cv-02776;

*Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-

**DECLARATION OF HELEN C. ECKERT  
IN SUPPORT OF SDI DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5**

**[RE SDI'S MIL NO. 1]**

1 05261;

2 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*,  
3 No. 11-cv-05513;

4 *Best Buy Co., et al. v. Technicolor SA, et al.*,  
5 No. 13-cv-05264;

6 *Target Corp. v. Chunghwa Picture Tubes,*  
7 *Ltd., et al.*, No. 11-cv-05514;

8 *Target Corp. v. Technicolor SA, et al.*, No. 13-  
9 cv-05686;

10 *Sears, Roebuck and Co. and Kmart Corp. v.*  
11 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-  
12 05514;

13 *Sears, Roebuck and Co. and Kmart Corp. v.*  
14 *Technicolor SA*, No. 13-cv-05262;

15 *Viewsonic Corp. v. Chunghwa Picture Tubes,*  
16 *Ltd.* No. 14-cv-02510.

1 I, Helen C. Eckert, declare as follows:

2 1. I am an associate at the law firm of Sheppard Mullin Richter & Hampton LLP,  
3 counsel of record for Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.; Samsung  
4 SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil Ltda.;  
5 Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI"). I  
6 submit this declaration pursuant to Civil Local Rule 79-5(d) to establish that documents or  
7 portions of documents containing "Confidential" and "Highly Confidential" information pursuant  
8 to the Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306) and submitted to the  
9 Court in connection with SDI's Motion *In Limine* To Prohibit Plaintiffs From Conflating SDI  
10 With Non-Parties, Including But Not Limited To Samsung Electronics Co., Ltd. ("SDI's MIL No.  
11 1") are sealable. Except for those matters stated on information and belief, about which I am  
12 informed and which I believe to be true, I have personal knowledge of the matters set forth herein  
13 and could and would testify competently to each of them.

14 2. The parties have disclosed or produced in this action certain documents and  
15 information designated as either "Confidential" or "Highly Confidential" pursuant to the  
16 Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306).

17 3. On February 13, 2015, SDI filed an Administrative Motion to Seal and lodged the  
18 following documents pursuant to Civil Local Rules 7-11 and 79-5(d) and (e):

19 a. Exhibits 1-2 of the Declaration of James L. McGinnis in Support of SDI's  
20 MIL No. 1 ("McGinnis Declaration").

21 4. Exhibit 1 to the McGinnis Declaration are excerpts of the September 26, 2014  
22 Rebuttal Report of Alan Frankel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City  
23 Stores, Inc. Liquidating Trust which reflects, contains or refers to documents or information  
24 designated as "Confidential" or "Highly Confidential" by Plaintiff Alfred H. Siegel, as Trustee of  
25 the Circuit City Stores, Inc. Liquidating Trust.

26 5. Exhibit 2 to the McGinnis Declaration are excerpts of the June 30, 2014  
27 Supplemental Report of Alan Frankel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City  
28 Stores, Inc. Liquidating Trust which reflects, contains or refers to documents or information

1 designated as “Confidential” or “Highly Confidential” by Plaintiff Alfred H. Siegel, as Trustee of  
2 the Circuit City Stores, Inc. Liquidating Trust.

3  
4 I declare under penalty of perjury under the laws of the United States of America  
5 that the foregoing is true and correct.

6 Executed this 13<sup>th</sup> day of February 2015 in Los Angeles, California.

7  
8 /s/ Helen C. Eckert

9 Helen C. Eckert